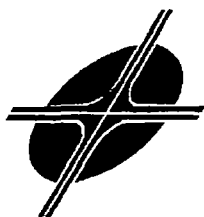


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ASH GROVE CEMENT WEST, INC.

3801 EAST MARGINAL WAY, SOUTH
SEATTLE, WA 98134
PLANT OFFICE (206) 623-5596

July 1, 1991

Mr. John Davis
U.S. EPA
1200 6th Avenue
Mail Stop AT-083
Seattle, WA 98101

Dear Sir:

This letter is to confirm our telephone discussions today pertaining to the filing of EPA Form R, Toxic Chemical Release Inventory Reporting Form, by Ash Grove Cement West, Inc. at its 3801 East Marginal Way South facility.

As was discussed earlier, this facility is currently used for cement distribution, both by bulk truck carrier and 94 pound sacks. Cement is received from our manufacturing facilities by railroad car and then unloaded into cement silos. From these silos, cement will either be loaded into bulk trucks or be packaged on site into 94 pound sacks. At this time there is no manufacturing or modification to the cement received, only cement handling and packaging is performed at the facility.

The only chemical at the facility which is considered to fall under the requirements of Form R is sulfuric acid which is used to neutralize storm runoff and cement handling equipment cooling water which is sometimes contaminated with cement. The sulfuric acid usage is monitored to maintain the collection pond in a neutral state.

From our discussions, it is my understanding that you feel that we fall under SIC code 5169, wholesale distribution, which will not require the filing of Form R for 1990. Under your direction, we will not be filing Form R at this time. We understand that our status will change when we begin to manufacture cement in May of 1992 and at that time we will fall under SIC code 3241.

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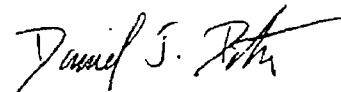
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Mr. John Davis
July 1, 1991

If at a later date you feel that our current direction is not proper, please contact us immediately and we will be happy to fill out Form R. Thank you for your direction and time concerning this matter.

Sincerely,

ASH GROVE CEMENT WEST, INC.

A handwritten signature in cursive script, appearing to read "Daniel J. Peters".

Daniel J. Peters
Plant Superintendent

cc. K. Rone
D. Hale